

PUBLIC COMMENTS

**TRI-PARTY AGREEMENT (TPA) CHANGE PACKAGES
100 AREA WASTE SITE REMEDIATION, 300 AREA
SURPLUS FACILITIES, 200 AREA RI/FS AND CANYON
FACILITIES RESPONSE ACTIONS**

COMMENT PERIOD

DECEMBER 10, 2012 THROUGH JANUARY 24, 2013



Oregon

John A. Kitzhaber, M.D., Governor



OREGON
DEPARTMENT OF
ENERGY

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January 4, 2013

Tiffany Nguyen
U.S. Department of Energy
Richland Operations Office
PO Box 550, MSIN A7-75
Richland, WA 99352

Dear Ms. Nguyen:

Thank you for the opportunity to offer comments on proposed changes to the Tri-Party Agreement (change numbers M-85-12-02, M-93-12-02, M-94-12-04, M-89-12-02, M-16-12-06, M-15-12-03).

It is unfortunate that the Hanford cleanup work identified in this change package is proposed for delay, though we recognize that in many cases the delays are caused by additional work scope being added.

The scope of some of the proposed delays is not well justified in the Change Control Form. We recommend that future significant proposed Tri-Party Agreement changes provide a more detailed explanation under the "Descriptions/Justification of Change" section of the form.

For the specific changes proposed, we offer these comments:

- *River Corridor Decision Documents*
 - Oregon agrees with the plan to obtain additional groundwater monitoring data in the 100 B/C Area before proposing a groundwater remedy.
 - Oregon had earlier recommended that the Tri-Parties not issue remedial investigation/feasibility studies and proposed plans for multiple reactor areas at the same time, due to the burden on agencies such as our own and on other stakeholders to review numerous lengthy documents in a short review period. We are pleased that the Tri-Parties now recognize this burden by delaying these documents for the N Area.
- *100 Area Remediation*
 - Oregon strongly supports efforts that have been taken to chase chromium plumes in several of the reactor areas. We are pleased that work has identified

additional waste areas for cleanup in numerous reactor areas. We believe a more thorough cleanup will result in less impact to the Columbia River.

- At the same time, we question whether more than four years of additional time is needed to accomplish this work. It appears the length of this delay is due largely to an anticipated lack of funding. While the additional work justifies some delay, the delay should be less than what is proposed.
- *324 Facility*
 - It is understandable that additional time is needed for remediation of the highly contaminated soil beneath the 324 Building. Here too it appears that some of the added schedule is due to anticipated budget constraints.
- *K-East and K-West Reactors*
 - Oregon supports additional soil characterization in the 100 K Area because of the sub-surface contamination from past leaks from the K-East basin. The proposed delays again seem somewhat excessive.
- *Canyons*
 - Demolition of Hanford's canyon facilities is far down the list of Oregon's priorities as compared with other cleanup work at Hanford. We believe it does make sense to use lessons learned from U Canyon demolition in planning for work on the other canyon facilities.

In many previous proposed Tri-Party Agreement change packages, there were obvious "gets" to go along with the "gives." This package seems bereft of gets – presumably because funding is tight and additional cleanup work cannot therefore be added.

Oregon proposes that as part of this change package – as a get – the agencies accelerate milestone M-062-45 (2) and make it an enforceable, rather than target milestone. This milestone currently states that beginning in April 30, 2015, as a target milestone (not enforceable until 2021), that the parties negotiate "contingency actions and milestones, of and as necessary, for providing new, compliant tanks with sufficient capacity and in sufficient time to complete (tank) retrievals under this agreement, regardless of (Waste Treatment Plant) operational deficiencies or retrieval conditions."

Given the recent circumstances with the inner shell leak of tank AY-102 and the likely loss of that tank for future use and the potential need to empty it, tank retrievals are certainly at risk now, as is the question of continued indefinite safe storage of the tank waste.

Oregon recommends the Tri-Parties initiate negotiations to identify contingency actions and milestones no later than July 1, 2013. It may be necessary to also negotiate a new System Plan (per M-062-40) or contingency plan to support these negotiations.

Discussions at both a local and national level in relation to anticipated cleanup funding for Hanford lead us to believe that we are likely to see numerous challenges in meeting existing Tri-Party Agreement milestones in the coming years based largely or exclusively on anticipated budget constraints. Clearly, additional funding is needed to at least keep somewhat apace with existing milestones.

Article 153 of the Tri-Party Agreement states that "Ecology disagrees that lack of appropriations or funding is a valid defense" for missing or renegotiating milestones. That will pose a dilemma for regulators – whether to roll back milestones simply because there isn't funding available, or hold firm in the hope that the threat of missing milestones will act as a driver to increase funding. We recommend that future decisions to move milestones due exclusively to lack of funding come only after careful deliberation. We do not want to see the Tri-Party Agreement become irrelevant because milestones are too easily rolled back when funding is tight.

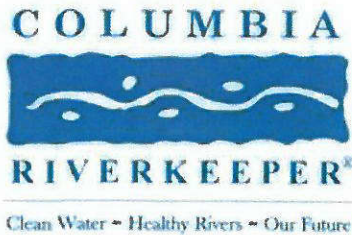
If you have any questions about our comments, please contact me at 503-378-4906.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Niles". The signature is fluid and cursive, with the first name "Ken" being more prominent than the last name "Niles".

Ken Niles, Administrator
Nuclear Safety Division

Cc Jane Hedges, Washington Department of Ecology
Dennis Faulk, U.S. Environmental Protection Agency
Matt McCormick, U.S. Department of Energy
Max Power, Chair, Oregon Hanford Cleanup Board
Steve Hudson, Chair, Hanford Advisory Board



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January 24th, 2013

Tiffany Nguyen
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Richland Operations Office
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Richland, WA 99352

Submitted Via Email to: TPACH@rl.gov

RE: Comments on Proposed Tri-Party Agreement Changes

U.S. Department of Energy:

Columbia Riverkeeper (Riverkeeper) submits these comments regarding the Tri-Party Agencies' proposal to amend the Tri-Party Agreement (TPA). Riverkeeper remains concerned that the changes to the TPA will prompt delays in cleanup of the River Corridor and the canyon facilities in the Central Plateau, and that the Department of Energy (Energy) is failing to adequately fund necessary cleanup activities. Cleanup is not a discretionary obligation for the Tri-Party Agencies (TPA Agencies), particularly in areas where polluted soils and groundwater pose a risk to the Columbia River, its aquatic life, Hanford workers, and downstream communities. Delays in completion of decision documents, as proposed in the TPA changes, will result in a slower pace for cleanup.

I. Some Proposed Changes Reflect the Discovery of New Waste Sites

We support the TPA Agencies' efforts in identifying new waste sites and expanding cleanup in the River Corridor to encompass newly discovered waste sites. As the TPA Agencies approach cleanup and demolition of contaminated structures and the soils and groundwater beneath them, we urge the TPA Agencies to recognize that cleanup and demolition often creates more work than the TPA Agencies originally anticipated. By candidly acknowledging that its

work scope in the River Corridor has grown, the TPA Agencies have bolstered public confidence about their willingness to address all cleanup challenges.

For example, the discovery of high levels of radioactive contamination under the 324 Building has slowed and complicated the cleanup of that area. However, discovery of the high levels of contamination in the 324 area will allow cleanup to proceed with a more realistic assessment of the contamination problem. Additionally, hexavalent chromium plumes in the 100-B/C and 100-D Areas were larger, deeper, and more toxic than anticipated. Going forward, we urge Energy and other TPA Agencies to recognize the uncertainties of cleanup in the River Corridor: TPA Agencies should anticipate that cleanup, thorough monitoring, and characterization of polluted soils will generate more cleanup work.

II. Delays in Cleanup Will Exacerbate Contamination

As TPA Agencies acknowledge, they have not accomplished all of their goals for the “2015 Vision” – a plan to complete much of the surface work for the River Corridor cleanup and “shrink the footprint” of the Hanford site. For years, we have urged Energy to change its public messaging to reflect the reality of cleanup near the Columbia River. Clearly, the TPA has resulted in significant cleanup progress, but severe and persistent challenges remain. Unfortunately, the “2015 Vision” presents a confusing picture about cleanup progress in the River Corridor. The “2015 Vision” focused on resolving issues on the surface of the River Corridor. However, groundwater and deeper vadose zone contamination will persist regardless of the completion of all “2015 Vision” goals. In recent years, TPA Agencies made significant progress in soil and groundwater cleanup, but the contamination in groundwater and soils in the River Corridor will remain a threat for generations to come. The proposed changes to the TPA starkly demonstrate that work in the River Corridor and the Central Plateau will continue for decades, and proposed delays in cleanup will allow contamination to continue to percolate deeper into Hanford’s soils and enter Hanford’s groundwater.

a. TPA Agencies are proposing to significantly push back key decisions for the River Corridor, which allows contamination to migrate

TPA Agencies’ proposals to push back key decisions for cleanup in the River Corridor demonstrate that the task of remediating toxic chromium and radioactive pollution is more

difficult than originally anticipated. For example, the TPA Agencies now propose to monitor a larger-than-expected plume of hexavalent chromium in the 100 B/C Area rather than proposing a final cleanup plan for the area. The TPA Agencies justify the delay by arguing that additional years of groundwater monitoring data would aid in assessing contamination in the B/C Area. While we agree that additional groundwater monitoring is a good idea, we urge Energy to accelerate clean-up activities in the River Corridor wherever possible. The TPA Agencies should move as quickly as possible towards robust, thorough cleanup actions that prevent hexavalent chromium from reaching the Columbia River. Additionally, TPA Agencies should incorporate recent upwelling data to shape upcoming decisions about how to prevent chromium from polluting the Columbia River. TPA Agencies should engage with the National Marine Fisheries Service and U.S. Fish and Wildlife Service to gauge the risk from contamination in the 100 B/C Area and the 300 Area entering aquatic habitat.

The TPA Agencies propose to extend the completion date of three existing milestones where contamination was more extensive than expected and to establish nine new interim milestones to address remediation of 100 Area waste sites, including 154 newly discovered waste sites. The original milestone date was to complete all interim cleanup actions by December 31, 2012. Now, the TPA Agencies propose to extend it to March 31, 2017 for completion of final actions. The TPA Agencies should explain why such a long delay is warranted for reaching final cleanup decisions. Proposed changes in the TPA appear to allow arbitrarily long delays for cleanup of the River Corridor and the Central Plateau. The TPA Agencies should explain why five years of additional time is necessary to plan for cleanup of newly discovered waste sites. During the next five years, the TPA Agencies should also commit to monitoring soil and groundwater contamination that will continue to migrate towards the Columbia River.

In the K Area, the TPA change proposal involves a significant delay in placing the K East reactor into interim safe storage (ISS). Only two years ago, Energy was considering a possible plan to fully demolish the K East reactor in order to access the soil and groundwater beneath the reactor as well as to reduce the contamination risk from the reactor, itself. The TPA Agencies argue that their proposed changes will allow cleanup of the K West and K East reactors to proceed more efficiently. However, the TPA Agencies do not fully address how the delay in

cleanup and ISS may allow contamination to enter soils, groundwater, and the Columbia River in the K Area.

We urge Energy and other TPA Agencies to hasten cleanup efforts in the K Area rather than offering arbitrary justifications for delayed demolition or ISS. Additionally, while we strongly support expanded monitoring and characterization of soils and groundwater in the K Area, the need for additional study should not preclude the consideration of full demolition of the K East reactor – an approach which might provide the TPA Agencies more ability to access and remediate pollution below the K Area. Pollution in the K Area includes chromium, Sr-90, nitrate, trichloroethene, C-14, and Tritium – all pollutants that could harm aquatic life in and near the Columbia River. Ultimately, an interim cap for the K Area seems to be preferable to a no-action approach: however, the removal of the K East reactor should be pursued by the TPA, regardless of cost.

Soils and groundwater that interact with the Columbia River are the most imminent threat to the health of the Columbia River. Accordingly, Energy's delay of key milestones – M-15-12-03, M-16-12-06, M-89-12-02, M-94-12-04, M-93-12-02 – deserve sincere, detailed scrutiny from TPA Agencies to quantify how the delays will increase migration of pollutants into groundwater and the Columbia River. The TPA proposal lacks detailed data about the likely impact of delays in cleanup. The delays will allow radioactive and chemical pollution to move deeper into the soils in the River Corridor, potentially reaching groundwater and the Columbia River, itself.

b. Energy must proceed with cleanup of the 324 Building as soon as possible, seeking additional cleanup funds if necessary

Energy acknowledges that the 324 Building, a structure that was slated for demolition and removal as part of the "2015 Vision" for River Corridor cleanup, has significantly higher radioactive pollution than the agency originally anticipated. We support Energy's thorough investigation of the contamination under the 324 Building. According to Energy, "While preparing the 324 Building for demolition, a breach was identified in the stainless steel liner on the floor of the research room known as B-Cell. Subsequent characterization of the soil beneath the facility confirmed that contamination had leaked into the soil through the breached liner and

concrete floor during prior facility operations.” Indeed, contamination below the 324 area presents a unique cleanup challenge. The contamination under the 324 Building approaches 9000 Rad at the source of the leak – a radiation level that threatens worker health and potentially the public if contamination reaches groundwater and the Columbia River. Based on these risks, Riverkeeper supports a concerted effort to address contamination in the 324 Area. The proposed TPA changes would delay completion of cleanup work by several years. Because demolition and remediation of dangerous chemical and radioactive waste in the 300 Area are so important, we urge Energy to adhere to current milestones and to prioritize cleanup of the 324 building. At the very least, we urge TPA Agencies to explain why several years of delay are necessary to address the severe, potentially mobile contamination under the 324 building.

c. Energy must acknowledge and, if possible, avert delays in Central Plateau Cleanup

The current TPA change proposal fails to acknowledge that the newly discovered River Corridor cleanup tasks coupled with restricted funding will negatively impact the achievement of Central Plateau cleanup. Realistically, TPA Agencies are not poised to complete the goal of completing major cleanup activities in the Central Plateau by 2020. Indeed, under the current funding regime, it appears that Central Plateau work will not be completed prior to 2035. For example, the TPA Agencies propose to extend the milestone for canyon remediation by 10 years. Remediation of the U Plant Canyon, including barrier placement, is scheduled to be completed in 2021. The U.S. Environmental Protection Agency (EPA) has expressed skepticism that TPA milestones for Central Plateau cleanup will be met in the wake of the increased work scope for the River Corridor. We urge TPA Agencies to provide the public with a comprehensive, realistic view of the current cleanup schedule for the Central Plateau.

d. Energy must adequately fund cleanup activities

TPA Agency representatives have repeatedly cited funding concerns for justifying delays in Hanford cleanup. We urge TPA Agencies to honestly evaluate the cost of achieving a compliant cleanup effort. The proposed TPA changes retreat from an aggressive, comprehensive cleanup approach by leaving contamination in Hanford’s soils and groundwater for an extended period of time. Although TPA Agencies have clearly made progress in remediating some of Hanford’s chemical and radioactive waste problems (the “big dig” in the B/C area is a great

example of aggressive cleanup), the proposed TPA changes delay key decisions and cleanup actions for far too long to meet the goal of protecting the Columbia River.

According to a letter sent to federal managers by multiple Western Governors in late 2012, Chris Gregoire (WA), Brian Sandoval (NV), Butch Otter (ID), Susana Martinez (NM) and Jerry Brown (CA): "While much progress has been achieved, we are now concerned that the national fiscal environment will result in the progress virtually grinding to a halt, resulting in significant environmental risk." (<http://www.tri-cityherald.com/2012/12/22/2214263/western-governors-want-trend-of.html#storylink=cpy>) Delays in River Corridor and Central Plateau cleanup may only worsen Hanford's cleanup problem without a strong commitment to adequately fund remediation of Hanford's waste.

- e. *Energy's focus on reducing the footprint of cleanup fails to address underlying contamination problems and confuses the public*

As Energy acknowledges, the agency has failed to accomplish all of its goals for the "2015 Vision" – a plan to complete most of the surficial cleanup of the River Corridor. Indeed, Energy representatives have stated that they intended to be "off the River" by 2015. Energy's promotion of the "2015 Vision" has led to public confusion, particularly because people realize that cleanup of the River Corridor must extend to deep soils and groundwater. The TPA Agencies have made significant progress in addressing deep vadose and groundwater issues, but the cleanup is not approaching completion for the River Corridor. While the "2015 Vision" may have been effective in promoting the cleanup effort, it has fundamentally understated the ongoing, difficult challenges that remain ahead for protecting the Columbia River from Hanford's chemical and radioactive contamination.

III. Energy may be required consult with National Marine Fisheries Service and U.S. Fish and Wildlife Service regarding impacts to Threatened and Endangered Species and designated Critical Habitat from proposed delays in cleanup.

Though TPA Agencies are soliciting comments regarding changes to the TPA, Riverkeeper encourages Energy, Ecology, and EPA to fulfill their consultation duties under the Endangered Species Act (ESA). See ESA § 7(a)(2). As a first step, the TPA Agencies should ask the National Marine Fisheries Service and the U.S. Fish and Wildlife Service whether

Columbia Riverkeeper Comments on Proposed TPA Changes

January 24th, 2013

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threatened or endangered species or designated critical habitat may be present in the action area, and whether delays in cleanup may result in increased contamination or exposure to threatened or endangered species. 50 C.F.R. §§ 402.12(c) & (d). The TPA Agencies should bear in mind that the action area for ESA purposes includes “all areas to be affected directly or indirectly by the Federal action and *not merely the immediate area involved in the action.*” 50 C.F.R. § 402.02 (emphasis added).

The Hanford Reach, adjacent to the areas that will be impacted by proposed delays in TPA cleanup milestones, contains ESA-listed salmonids and designated critical habitat. 70 Fed. Reg. 37160, 37163; 71 Fed. Reg. 834; 70 Fed. Reg. 52630, 52733, 52760. The Hanford Reach is within the action area for the TPA changes, which impact the 100 Area, 300 Area, Hanford’s groundwater, and the Central Plateau. Accordingly, Energy should begin the ESA § 7(a)(2) consultation process by asking NMFS and FWS if critical habitat or endangered species are present and will be impacted by the proposed TPA changes. 50 C.F.R. §§ 402.12(c) & (d).

IV. Conclusion

While Columbia Riverkeeper appreciates the TPA Agencies’ effort to incorporate new waste sites into cleanup plans, we object to arbitrary, budget-driven delays in the schedule for cleanup in the River Corridor and the Central Plateau. The current information available to the public does not justify long delays in cleanup activities, and it understates the long-term shortfall in resources available for simultaneous cleanup in the River Corridor and the Central Plateau. We urge the TPA Agencies to rethink the proposed long delays in cleanup deadlines.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel R. Serres". The signature is fluid and cursive, with the first name "Daniel" being the most prominent part.

Daniel R. Serres
Conservation Director, Columbia Riverkeeper



January 24, 2013

Tiffany Nguyen
U.S. Department of Energy
Richland Operations Office
PO Box 550, A7-75
Richland, WA 99352
TPACH@rl.gov

Dear Ms. Nguyen,

Hanford Challenge hereby submits comments on the currently proposed changes to the Tri-Party Agreement (TPA) ("Hanford Federal Facility Agreement and Consent Order Proposed Revisions Pertaining to 100 Area Waste Site Remediation, 300 Area Surplus Facilities, 200 Area RI/FS, and Canyon Facilities Response Actions").

As an initial matter, Hanford Challenge wonders why it is that these comments are being directed to the Department of Energy – the regulated entity – rather than the regulators, Department of Ecology and/or the EPA. The optics of addressing comments to DOE imply that DOE is the sole decision-maker in these matters.

Delays once again plague the latest round of changes proposed to the TPA. Hanford Challenge believes that the TPA is one of many tools that drives cleanup progress, and assures that cleanup of the Hanford Site remains a priority at both the State and Federal levels. Although some delays may be reasonable due to new information, technological challenge, increased scope, and the critical need to keep workers and the public safe, delays justified by anticipated "lack of funding" are unacceptable. Milestones support strategically planned cleanup work, track progress, and must be enforceable to drive funding if we are to achieve the ultimate goal of safe and effective Hanford cleanup.

Hanford Challenge requests that the Tri-Party Agreement (TPA) Agencies clearly communicate the risks posed by surface, sub-surface, and groundwater contamination at the Hanford Nuclear Site and along the Columbia River with the public and policymakers, and use that risk to justify modifications to the TPA. A realistic assessment of the risks, timing, and true costs of cleanup will result in deadlines that are realistic and enforceable, and be used to justify funding for a cleanup that is thorough, safe, and effective.

Article 153 of the Tri-Party Agreement states that "Ecology disagrees that lack of appropriations or funding is a valid defense" for missing or renegotiating milestones. Hanford Challenge does not want to see the TPA become irrelevant because milestones are easily shifted due to anticipated lack of funding. We recommend that milestones not be adjusted simply for lack of

funding – this would be an unacceptable answer for most polluters, especially when it is clear that the polluter has the resources (as here), but simply chooses not to spend money on meeting the previously-committed to agreement deadlines. In our view, we expect the State of Washington to fulfill its responsibility to protect Washington State by requiring the Department of Energy to request adequate levels of funding to meet the cleanup deadlines. If the DOE fails to do so, or Congress fails to provide the resources, the State of Washington should reject lack of funding as a legitimate justification, and take appropriate legal actions to bring about compliance --- just like it would the chemical company down the street.

Regarding the specifics of this TPA change package, Hanford Challenge is concerned that the Change Control Form gives little justification or explanation for the proposed delays. We recommend that future significant proposed Tri-Party Agreement changes provide a more detailed explanation under the “Descriptions/Justification of Change” section of the form.

We offer these additional comments on specific proposed changes:

M-94-12-04, M-89-12-02 – 324 Building - The contamination under the 324 Building poses a high dose risk to workers (approximately 9000 Rad at the source) and a potential risk to the public if that contamination reaches groundwater and the Columbia River. Because of these risks, and because delaying 324 Building cleanup will further delay completion of 300 Area cleanup and closure, Hanford Challenge believes remediation of the leak under the 324 Building leak should not be delayed.

Hanford Challenge advises DOE to seek and provide additional funding, separate from the DOE-Richland Operations Office compliance budget, to remediate the 324 Building contaminant leak now instead of delaying the work further and increasing the risk to public and environmental health.

M-85-12-02 – It is important to incorporate lessons learned from U Plant Canyon. The Parties must work to create deadlines that incorporate lessons learned and ensure both the health and safety of the Hanford workforce and the containment of environmental contamination. While we understand and support some delay on this challenging area of the site, a 10-year extension appears excessive without further reasoning.

M-15-12-03 - River Corridor Decision Documents – Hanford Challenge supports further groundwater monitoring in the 100 B/C Area before proposing a groundwater remedy. We hope this can be accomplished accurately and expeditiously so an appropriate groundwater plan can be acted upon.

100 Area Remediation - Hanford Challenge supports the tracking of chromium plumes in several of the reactor areas. A more thorough cleanup will protect the Columbia River and environmental and human health. The timeline however, seems excessive once again. We also question whether more than four years of additional time is needed to accomplish this work. While the additional work justifies some delay, the delay should be less than what is proposed. Again, anticipated lack of funding should not control the setting of important environmental remediation deadlines.

M-93-12-02 - K-East and K-West Reactors- Hanford Challenge supports additional soil characterization in the 100-K Area because of the sub-surface contamination from past leaks from the K-East basin. However, the proposed delays again appear excessive.

In addition to the comments above on the proposed changes, Hanford Challenge proposes the following --

M-062-45 (2) – Hanford Challenge proposes that the Agencies accelerate milestone M-062-45 (2) and make it an enforceable, rather than target milestone. Currently, April 30, 2015 is a target milestone and not enforceable until 2021 for the parties to negotiate “contingency actions and milestones, of and as necessary, for providing new, compliant tanks with sufficient capacity and in sufficient time to complete (tank) retrievals under this agreement, regardless of (Waste Treatment Plant) operational deficiencies or retrieval conditions.”

Given the challenges at the Waste Treatment Plant and the recent knowledge of an inner shell leak in tank AY-102 and the potential need to empty that tank, tank retrievals are certainly at risk now, as is the question of continued indefinite safe storage of the tank waste. Hanford Challenge recommends the Tri-Parties initiate negotiations to identify contingency actions and milestones no later than July 1, 2013, i.e., begin design and construction on new double-shelled tanks. It may be necessary to also negotiate a new System Plan (per M-062-40) or contingency plan to support these negotiations.

The TPA Agencies must continue to strategically plan a cleanup schedule that tracks progress and is enforceable if we are to achieve the ultimate goal of a safe and effective Hanford cleanup.

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Tom Carpenter".

Tom Carpenter, Executive Director

A handwritten signature in black ink that reads "Meredith Crafton".

Meredith Crafton, Legal Intern

HANFORD ADVISORY BOARD

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February 8, 2013

Kevin Smith, Manager

U.S. Department of Energy, Office of River Protection

P.O. Box 450 (H6-60)

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U.S. Environmental Protection Agency, Region 10

309 Bradley Blvd., Suite 115

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Jane Hedges, Program Manager

Washington State Department of Ecology

3100 Port of Benton Blvd.

Richland, WA 99354

Re: Tri-Party Agreement Change Package

Dear Messrs. Smith, McCormick, Faulk and Ms. Hedges,

Background:

The Hanford Advisory Board (Board) is appreciative of the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) for agreeing to consider and respond to this advice on the currently proposed changes to the Tri-Party Agreement ("Hanford Federal Facility Agreement and Consent Order Proposed Revisions Pertaining to 100 Area Waste Site Remediation, 300 Area Surplus Facilities, 200 Area RI/FS, and Canyon Facilities Response Actions"), although this advice will be received after the public comment period has closed.

Since its inception, the Board has supported and relied on the Tri-Party Agreement as a living document and guiding force for Hanford cleanup. The Board applauds DOE, EPA

HAB Consensus Advice # 264

Subject: TPA Change Package

Adopted: February 8, 2013

Page 1

and Ecology for continuing work to find common ground on cleanup choices, and to reach agreement on changes to the Tri-Party Agreement as they become necessary.

Although the Board does have some concerns about an established pattern of delaying cleanup activities through changes to the Tri-Party Agreement, we recognize that the modifications contained within this proposed change package represent the reality of where we are today. While milestones are the very backbone that supports strategically planned cleanup work and track progress as the cleanup activities continue to completion, the ultimate goal is safe and effective Hanford cleanup.

On some occasions, discovery of previously unknown contamination has demanded our immediate attention and redirected even the best planning efforts. Examples include the large expansions of chromium VI removal efforts in the 100 Area. The most recent example is the discovery of an area of very highly radioactive soil contamination beneath B Cell of the 324 Building in the 300 Area during ongoing decontamination and decommissioning activities.

Cesium and strontium contamination under the 324 Building pose a high dose risk to workers (approximately 9000 rad/hour at the source) and a potential risk to the public if that contamination reaches groundwater and the Columbia River. Because of these risks, and because delaying 324 Building cleanup will further delay completion of 300 Area cleanup and closure, the Board believes remediation of the contaminated soil under the 324 Building should not be delayed.

Advice:

- The Board believes that risk reduction through cleanup along the Columbia River is central to meeting the goals identified in DOE's 2015 Vision. To that end, the Board advises DOE to seek and provide additional funding, separate from the DOE-Richland Operations Office compliance budget request, to remediate the 324 Building contaminated soil now instead of delaying the work to out-years.

Sincerely,



Steve Hudson, Chair
Hanford Advisory Board

This advice represents Board consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Jeff Frey, Deputy Designated Official, U.S. Department of Energy, Richland
Operations Office
Catherine Alexander, U.S. Department of Energy, Headquarters
The Oregon and Washington Delegations

1520 N. Laventure Rd, #22

Mt Vernon, WA 98273

January 14, 2013

Ms Tiffany Nguyen
US Department of Energy
PO Box 550,
Richland, WA 99352

Dear Ms Nguyen:

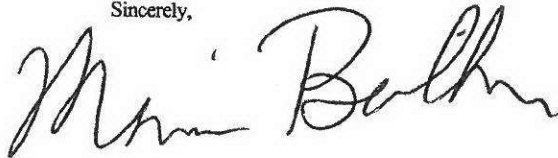
My comment is regarding the regulatory request to add 324 building into the Hanford permit—which strikes me as a bizarre ARAR for the update to the 300 Area Remedial Design Report/Remedial Action Work Plan (Plan) WAC 173-303-610 closure standard should not be invoked as it is not going to be relevant to the remediation necessary for the waste site 300 296 when the Plan is updated.

It is uncertain what value 173-303-610 has as an ARAR. 324 is not a TSD, nor could it ever be made a TSD, hence why the Washington Department of Ecology went to direct closure of the facility. Soil cleanup beneath the facility should be based upon WAC 173-303-64620 (which is identified as an ARAR). Therefore, closure requirements under WAC 173-303-610 should not be considered an ARAR for either the updated Plan necessary after the final ROD or for the future the 300 Area RI/FS. For example, subsections (2) through (6) of this section, apply to the owners and operators of all dangerous waste facilities, but 324 is not a dangerous waste facility. What does inclusion of this requirement provide? Subsections (7) to (11) of this section apply to the owners and operators of all regulated units at which dangerous waste will remain after closure—yet this is all CERCLA work and falls under MTCA B—610 doesn't appear to be relevant.

Additionally, the thought of spending any money on 324 permitting costs, both in time at the Department of Ecology and USDOE, seems counterproductive—this produces paperwork of no redeeming value that probably subtracts from the effort to actually perform cleanup.

If the regulators desire to continue WAC 173-340-610 as an ARAR, additional clarification should be provided to the public to understand what part of this regulation is an ARAR.

Sincerely,

A handwritten signature in black ink, appearing to read "Monica Billings". The signature is fluid and cursive, with the first name "Monica" and last name "Billings" clearly distinguishable.

Monica Billings

Dennis Young
1512 Torthay Pl
Richland, WA 99354
Ph: 505-420-4458
Dec. 14, 2012

Dept. of Energy
Richland Operations Office
P.O. Bx 550, A7-75
Richland, WA 99352

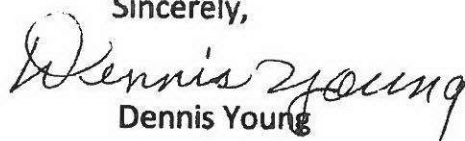
Dear Ms Nguyen:

Could the canyon buidings with their 5 foot thick walls be considered for storage of the Vitrification Plant glassified logs? The radiation and chemical wastes could then be contained in their process buildings to prevent further spread of contamination to other locations.

Utilize the ALARA (As Low As Reasonably Achieveable) program.

I was employed on the Hanford Project from 1963 to March 1989 with 5 different companies.

Sincerely,


Dennis Young

RECEIVED
JAN 02 2013
DOE-RLCC

PO Box 205
Richland, WA 99352
December 12, 2012

Dear Ms Nguyen:

The M-89-06 milestone seems to be an unnecessary administrative burden which CERCLA attempts to remove; it provides no additional clean up, and expends scarce tax dollars in a time of financial crisis.

In environmental terms it is an unnecessary milestone. Demolition and removal of the facility is already captured within the scope of a CERCLA EE/CA, action memorandum, and removal action work plan. In addition, remediation in the 300 area is already covered via the M-16 milestone series. The M-89-06 serves merely as very expensive icing on the cake.

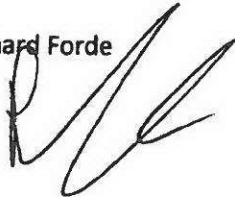
Why are additional requirements being added when 40CFR 300 does not seem to require? Additionally, the demolition and removal required by the action memorandum, removal action work plan, and the M-94 series provides positive clean up; M89-06 merely provides more paperwork. There already is a closure plan for 324 which in conjunction with additional existing agreements (such as NPL 141) allows the existing closure plan to be completed once the building is gone. The real use for the M-89 series seems somewhat useless, as it is already covered by the M-94 and M-16 series. Why aren't the three parties REMOVING the m-89 milestones if they are trying to streamline work?

The M-89 milestone series, which was used to clean out the 324 building, appears to have outlived its usefulness. It would be more cost effective, and just as environmentally responsible, to delete the M-89 milestone series totally, and use the M-94 milestones as the mechanism to remove the building, and use milestone M-16-00B as the milestone to remediate under the building.

Additionally, how is it that a building that could not be permitted under WAC 173-303 when M-89-00 was developed years ago and required to go directly to closure (324), suddenly needing a permit. The waste site under 324 is a classic CERCLA action, and less a RCRA action. The directed closure of M-89-00 was written prior to the development of the EE/CA, Action Memorandum, and removal action work plan. The Action Memorandum should have been clearer that the M89-00 milestone served no function anymore. The M-89 milestones should be deleted in order to allow the CERCLA process to proceed.

Sincerely,

Richard Forde



RECEIVED

JAN 02 2013

DOE-RLCC

From: Mike Conlan [<mailto:mikeconlan@hotmail.com>]
Sent: Friday, January 11, 2013 1:01 PM
To: Heart of America NorthWest; ^TPA Change Packages
Subject: Comment on Clean Up

U.S. Dept of Energy

January 2013

This is a comment re: your latest proposed changes.

The entire Hanford nuclear mess should be cleaned up as thoroughly as scientific and humanly possible.

Until the technology is developed NO MORE WASTE added to the pile from any source!!

I have commented on your performance for over 20 years; and it really seems like the biggest accomplishment DOE has achieved is extracting dollars from the public.

Still leaking tanks old and new, still no glassification of nuclear waste, MORE radiation in the Columbia, more extended deadlines and attempts to weasel out of a complete job.

YOU HAVE VERY LITTLE integrity, YOUR WHOLE DEPT NEEDS TO BE REVIEWED FROM AN INDEPENDENT SOURCE – OR THE JOB WILL NEVER GET DONE.

Sincerely,

Mike Conlan
Redmond W

From: Mike Conlan [mailto:mikeconlan@hotmail.com]
Sent: Friday, January 18, 2013 12:49 PM
To: hanford comment; ^TPA Change Packages; Heart of America NorthWest
Subject: Hanford CleanUp

The following comments were sent to DOE and HoANW recently.

U.S. Dept of Energy

January 2013

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The entire Hanford nuclear mess should be cleaned up as thoroughly as scientific and humanly possible.

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Sincerely,

Mike Conlan
Redmond WA

From: Geoff Hayes [mailto:ghayes07@gmail.com]
Sent: Wednesday, January 23, 2013 9:15 PM
To: ^TPA Change Packages
Subject: TPA revisions

Hello:

The work needs to be done slowly and safely to protect the environment and the workforce. More time is needed. The revisions are a good thing.

Geoff Hayes

-----Original Message-----

From: Robin Miller [mailto:robin1miller@comcast.net]

Sent: Thursday, January 24, 2013 9:22 AM

To: ^TPA Change Packages

Subject: Coal & our future

Dear Ms. Nguyen, I'm writing about an issue of grave concern to those of us who live in the Columbia River Gorge and one that should be to all who love our beautiful state. My name is Rob Miller and I have lived in Oregon since 1991. I moved my family and business here primarily for the quality of life Oregon afforded us. I understand that there is a plan to move 100 million tons of coal from Montana to Pacific port for shipment to China. These shipments would move by rail and barge in open coal cars through the Columbia River Gorge and the Portland Metro area. There are many reasons why this is a bad idea. The toxic coal dust is a threat to our children's health, the produce from our vineyards and orchards, to our beautiful rivers and our sport and commercial fishing industries, the likelihood of train derailments and the sheer amount of increased traffic at grade crossings. And when China burns that coal in their thousands of plants we will reap the acid rain that it generates causing more pollution. And why burn so much fossil fuel to transport another fossil fuel half way around the world? Just to help balance our trade deficit?! The transportation of this coal will cost us as a nation much more in the long term than it will benefit a few in the short term.

This project should be looked at and judged upon its entirety. 600000 pounds of coal dust into the air every day. Please say No to this foolish plan.

Thank you,

Robin Miller

Hood River, OR 97031

-----Original Message-----

From: slugranch85@wwest.net [mailto:slugranch85@wwest.net]

Sent: Thursday, January 24, 2013 11:31 AM

To: ^TPA Change Packages

Subject: Clean up Hanford / Proposed Amendment to the Tri-Party Agreement

To:

Tiffany Nguyen

U.S. Department of Energy

Richland Operations Office

re: Tri-Party Agreement Change Package

P.O. Box 550, A7-75

Richland, WA 99352

TPACH@rl.gov

Dear U.S. Department of Energy:

Re: Proposed Amendment to the Tri-Party Agreement

I Support A New Vision for Hanford. Five years ago, the U.S. Department of Energy ("Energy") released their "2015 Vision" for the Hanford Nuclear Site – a public relations campaign to show short-term progress with Hanford clean-up. Energy's campaign misleads the public. Even Energy now admits that the River Corridor will not be cleaned up by 2015. I'm writing to ask Energy to level with the public about dangerous pollution along the Columbia River and the progress—or lack thereof—of clean-up.

I urge Energy:

1. Tell the truth about the timing and the cost of Hanford clean-up.
2. Do not extend clean-up deadlines based on an alleged lack of funding.
3. Stop defining progress with confusing statistics such as the site footprint. Instead, detail the true quantity of hazardous chemicals that remain in the River Corridor and at the Hanford Site, both on the surface and in the ground.
4. Acknowledge the well-known fact that Uranium 235 has a half-life of about 100,000 years. This is NOT a short-term problem.

Signed,

Alan Richards / Naselle WA 98638

Dear U.S. Department of Energy:

I Support A New Vision for Hanford. Five years ago, the U.S. Department of Energy ("Energy") released their "2015 Vision" for the Hanford Nuclear Site - a public relations campaign to show short-term progress with Hanford cleanup. Energy's campaign misleads the public. Even Energy now admits that the River Corridor will not be cleaned up by 2015. **I'm writing to ask Energy to level with the public about dangerous pollution along the Columbia River and the progress—or lack thereof—of cleanup.**

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<i>George A Pantely</i>	GEORGE A. PANTELY	<i>brgmgtld@yahoo.com</i>
signature	printed name	email
<i>5276 QUINN DRIVE</i>	<i>Parkdale, OR 97041</i>	<i>541-352-5550</i>
Street Address	City, State, Zip	phone

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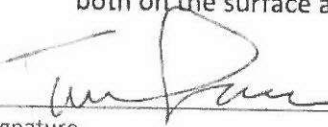
 signature	MARYANNE CISZMAZIA printed name	surfmanama@gorge.net email
P.O. Box 102 Street Address	UNDERWOOD, WA 98651 City, State, Zip	541-490-7716 phone

Dear U.S. Department of Energy:

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 Tina Lassen tina.lassen@aol.com
signature printed name email

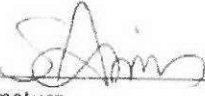
1009 Lincoln St Hot River OR 97031
Street Address City, State, Zip phone

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 SEAN AMICO writeflyer@mlc.com
signature printed name email

1767 12th St, #388 HOOD RIVER OR 97031
Street Address City, State, Zip phone

Dear U.S. Department of Energy:

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I urge Energy:

Store it underground like in Finland (Onkalo!)

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Michael Fuchs

signature

Michael Fuchs

printed name

figety@hotmail.com

email

102 Shaddeh Springs Rd. Underwood, WA 98672

Street Address

City, State, Zip

503 706 4485


phone

Dear U.S. Department of Energy:

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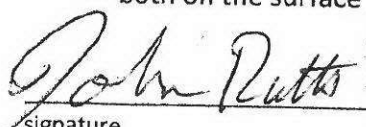

signature Elizabeth Stank
printed name stankratte@mexi.net.com
email
PO Box 577
Street Address Mosier, OR 97040
City, State, Zip
phone

Dear U.S. Department of Energy:

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signature JOHN RATTS
printed name STANRATT@MOLINET.COM
email
2191 RATTLER RIDGE Rd.
Street Address MOSIER, OR 97040
City, State, Zip
phone

From: Steven Woolpert [mailto:Swoolpert@cwcmh.org]
Sent: Thursday, January 24, 2013 10:35 AM
To: ^TPA Change Packages
Cc: Steven Woolpert
Subject: FW: DOE--Hanford cleanup comment

Tiffany Nguyen
U.S. Department of Energy
Richland Operations Office
re: Tri-Party Agreement Change Package
P.O. Box 550, A7-75
Richland, WA 99352
TPACH@rl.gov

Dear U.S. Department of Energy:

Re: Proposed Amendment to the Tri-Party Agreement

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Signed,

Steven Woolpert PO Box 3 Lyle, WA 98635

Email communication including any information transmitted with it is intended only for the use of the addressee(s) and is confidential. If you are not an intended recipient or responsible for delivering the message to an intended recipient, any review, disclosure, conversion to hard copy, dissemination, reproduction or other use of any part of this communication is strictly prohibited, as is the taking or omitting of any action in reliance upon this communication. If you receive this communication in error or without authorization please notify us immediately by return e-mail or otherwise and permanently delete the entire communication from any computer, disk drive, or other storage

From: heatherchapin@comcast.net [mailto:heatherchapin@comcast.net]
Sent: Thursday, January 24, 2013 10:55 AM
To: ^TPA Change Packages
Subject: Re: Proposed Amendment to the Tri-Party Agreement

Dear U.S. Department of Energy:

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Signed,

Heather Chapin
Portland, OR

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signature

printed name

email

Street Address

City, State, Zip

phone

Miglena Sanchez

miglena@gmail.com

2000000000

Red River OR 97031


916 749 8789

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	LYOUBOMIR MIRTCHEV	lubomir@hotmail.com
signature	printed name	email
PO Box 63	Hood River OR 97031	202-215-9726
Street Address	City, State, Zip	phone

Dear U.S. Department of Energy:

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	David McClure	KMSunrise914@gmail.com
signature	printed name	email
4047 Mt. Meadow Dr.	Mt. Hood OR 97041	541 399 2736
Street Address	City, State, Zip	phone

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<u>Tanya Andree</u>	<u>Tanya Andree</u>	<u>tanya.k02@gmail.com</u>
signature	printed name	email
<u>7104 Sylvan way</u>	<u>Mosier, OR 97040</u>	<u>(815) 508 5929</u>
Street Address	City, State, Zip	phone

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signature		printed name	Jennifer Silapal	email	jsilapal@yahoo.com
Street Address	305 W Franklin St	City, State, Zip	Bingen WA 98672	phone	(307) 359-1212

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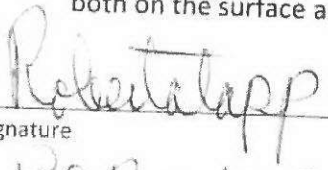
Cynthia Baker *Kitercynadi@mac.com*
signature printed name email
6925 Seven Mile Hill Rd, The Dalles, OR 97058 *239-850-7513*
Street Address City, State, Zip phone

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	Robertalapp	
signature	printed name	email
PO Box 155	Hood River OR 97031	
Street Address	City, State, Zip	phone

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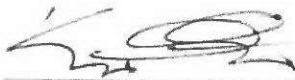
<u>Marion T. Fox</u>	<u>Marion T. Fox</u>	
signature	printed name	email
<u>PO Box 767</u>	<u>White Salmon, WA</u>	<u>98672</u>
Street Address	City, State, Zip	phone

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 KRIS OSTNESS JUNK OSTNESS@WAC.COM
signature printed name email
PO BOX 1976 WHITE SALMON, WA 98672
Street Address City, State, Zip/phone
(800) 541 1095

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signature

Thomas J Slagle

printed name

ThomasSlagle@gmail.com

email

Street Address

City, State, Zip

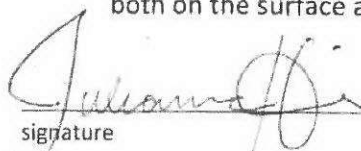
phone

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 signature Julianna Hein printed name juliannahein@gmail.com email

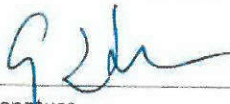
4365 Wooded Acres Dr. Hood River, OR 97031 559-719-9241
Street Address City, State, Zip phone

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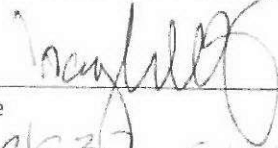
	Elizabeth Flake	elfio@yahoo.com
signature	printed name	email
25 Eugene	Hood River, OR 97031	(512) 468-2675
Street Address	City, State, Zip	phone

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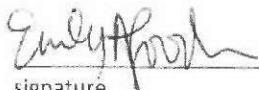
signature		printed name	Tracy Willett	email	
Street Address	2537 Elliot Dr.	City, State, Zip	Hood River OR	phone	

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signature

Emily Goodwin

printed name

emily.goodwin@gorge.net

email

1511 B Street

Street Address

Hood River OR 97031

City, State, Zip

503-358-1949

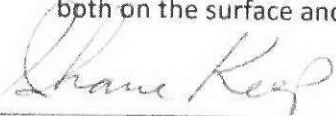
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	Shane Keep	shane_keepe@hotmail.com
signature	printed name	email
413 E. Humboldt Bingen WA 98603		
Street Address	City, State, Zip	phone

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signature


printed name

email

Street Address

City, State, Zip

phone

 KIRBY ECKER KEDESIGNS@GOLDF.NET
78 BLACKBERRY LN, WHITE SALMON, WA 98672


509-637-4377

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<u></u>	<u>Greta Hein</u>	<u>ee1ood@aol.com</u>
signature	printed name	email
<u>4365 Wooded Acres Dr.</u>		
Street Address	City, State, Zip	phone

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 MICHAEL D. BALLINGER ridgeromer@gorge.net
signature printed name email

1015 LINCOLN The Dalles, Ore 97058 541-980-5163
Street Address City, State, Zip phone

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<u>John A. Kraus</u>	<u>John A. Kraus</u>	<u>KRAUS@GORE-ENERGY.NET</u>
signature	printed name	email
<u>91 Orchard Ln</u>	<u>Underwood WA 99061</u>	
Street Address	City, State, Zip	phone

Move Clean up to
outside agency
Hold DOE accountable!

Funding!
Expect a thorough
clean up!
Keep it on the Radar
Green

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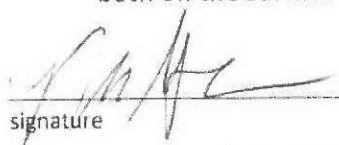
signature Karen Harding printed name KAREN HARDING email kharding@jorge.net
Street Address 5947 Miller Rd. City, State, Zip At. Hood, OR 97041 phone 541-352-7550

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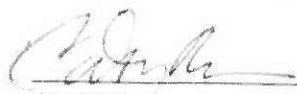
 signature	Nick Kraemer printed name	nick.kraemer@gmail.com email
5725 Neal Cr Rd Street Address	Hood River, OR 97031 City, State, Zip	541 399-1812 phone

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signature



printed name

email



Street Address



City, State, Zip



phone

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signature

printed name

email

Street Address

City, State, Zip

phone

James Dunlop

jdunlop@rocketmail.com

P.O. Box 174

Bingen WA

98605

(509)

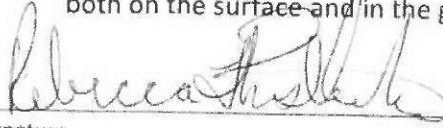
310-9029

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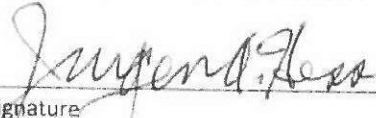
	Rebecca Thistlethwaite	ecogroovie
signature	printed name	email
PO Box 174	Bingen, WA 98605	@yahoo.com
Street Address	City, State, Zip	phone
		831-687-6512

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 signature	Jürgen A. Hess printed name	hess@gorge.net email
412 24th St. Street Address	Hood River OR City, State, Zip	97031 phone

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	KRIS GANN	
signature	printed name	email
	HR 97031	
Street Address	City, State, Zip	phone

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signature

printed name

email

Street Address

City, State, Zip

phone

JOSH SAMPIERO

j50@uncc.edu
josh

100 Hwy 35

Had River, OR

97331

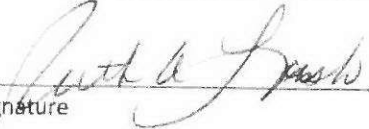
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	<u>Ruth Lusk</u>	
signature	printed name	email
<u>2263 W. Prospect St.</u>	<u>Hood River OR 97031</u>	
Street Address	City, State, Zip	phone

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	Paul Cook	paulburrencook@gmail.com
signature	printed name	email
PO Box 553	Hood River, OR 97031	
Street Address	City, State, Zip	phone

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Leslie Cunningham Leslie Cunningham lesliejolle@hotmail.com
signature printed name email
P.O. Box 1806 White Salmon, Wa 98672 —
Street Address City, State, Zip phone

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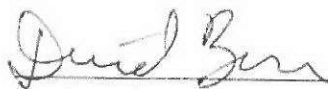
<u>Ann E. Stephenson</u>	<u>Ann E. Stephenson</u>	<u>a.stephenson@hotmail.com</u>
signature	printed name	email
<u>P.O. Box 41</u>	<u>White Salmon, WA 98672</u>	<u>360-771-5288</u>
Street Address	City, State, Zip	phone

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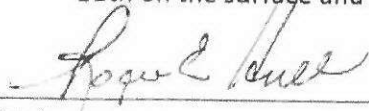
	DAVID BERN	
signature	printed name	email
PO Box 373	Lyle, WA 98635	
Street Address	City, State, Zip	phone

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	ROGER E HULL	REEMVINEYARDS@gmail.com
signature	printed name	email
P O BOX 45	LYLE WA 98635	541 993 4062
Street Address	City, State, Zip	phone

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	DAVID Michalek	EDM_Avstn@yahoo.com
signature	printed name	email
25 Eugene	Heed River OR 97031	707 548 3968
Street Address	City, State, Zip	phone

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<u>Richard L. Polson</u>	<u>RICHARD L. POLSON</u>	<u>dirtclod12mac.com</u>
signature	printed name	email
<u>5885 BERRY DR</u>	<u>PARKDALE OR 97041</u>	<u>541-806-2503</u>
Street Address	City, State, Zip	phone

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	EDIE POLSON	ediepolson@gmail.com
signature	printed name	email
5885 BERRY RD	PARKDALE OR 97041	541 806-0912
Street Address	City, State, Zip	phone

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signature	printed name	email
		
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 Carol Benskin
signature printed name email

P.O. Box 2349 White Salmon WA 98672
Street Address City, State, Zip phone

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signature

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[Handwritten signature] *Marcel LeBeau*

1212 Denny Ave #14 Chico CA 95926

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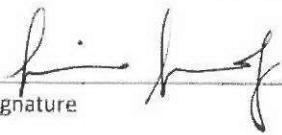
 Kaitie Winters pmessmoodle@vetfini
can
Hood River, OR 97031

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	BIANCA FERNANDEZ	bferman1@alumni.nd.edu
signature	printed name	email
3450 AGA Road	Hood River, OR 97031	786-512-7237
Street Address	City, State, Zip	phone

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	ADAM C SMITH	adamof today@gmail.com
signature	printed name	email
1317 Columbia St.	Hood River OR 97031	503-758-6925
Street Address	City, State, Zip	phone

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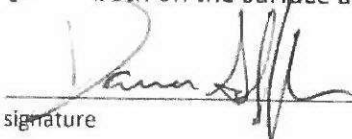
 signature	Bonnie Lenneman printed name	bonnie.lenneman@gmail.com email
6804 N Mississippi Ave. Street Address	Portland, OR 97217 City, State, Zip	989-413-1893 phone

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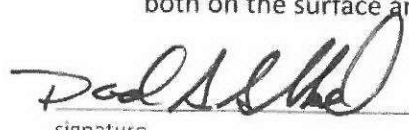
	Dana Scheffler	dans71@hotmail.com
signature	printed name	email
120 NE Hood St.	White Salmon, WA 98672	509-637-3559
Street Address	City, State, Zip	phone

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 David S. Skakel
signature printed name email


1550 State rd., Mosier, Oregon 97040
Street Address City, State, Zip phone

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	Robin Engle	robin-heather engle@gmail.com
signature	printed name	email
1802 SE 12th AVE #3	portland OR 97214	503-896-9967
Street Address	City, State, Zip	phone

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Beth A. Hoezee
signature

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printed name

bhoeezee1@gmail.com
email

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<i>Ashley Erdely</i>	Ashley Erdely	erdely.ashley@gmail.com
signature	printed name	email
78 Blackberry Lane	White Salmon, WA	541.399.2481
Street Address	City, State, Zip	phone
(P.O. 1773)	98672	

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Megan Saunders

signature

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printed name

megan247@yahoo.com

email

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